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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

**IN RE: SOCIAL MEDIA
ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,**

MDL No. 3047

Case No. 4:23-cv-1804-YGR

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED RE: PLAINTIFF'S RESPONSE
IN OPPOSITION TO MOTION FOR
SUMMARY JUDGMENT (BREATHITT)
(SD MSJ No. 1)**

THIS DOCUMENT RELATES TO:

Breathitt County School District, By and
Through the Breathitt County Board of
Education v. Meta Platforms Inc., et al.

20 Case No.: 4:23-CV-1804

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), undersigned Plaintiff files this Administrative Motion to Consider Whether Another Party's Material Should be Sealed regarding Plaintiff's Response in Opposition to Motion for Summary Judgment. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus motion. By stating below that Defendants may consider material to be confidential, Plaintiff is not taking a position regarding whether the material is in fact confidential.

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Docket No.	Document	Designating Party
ECF No. 2360-1	Plaintiff's Response in Opposition to Motion for Summary Judgment (Breathitt) (SD MSJ No. 1)	Not redacted or sealed.
ECF No. 2360-2	Declaration of Ronald Johnson	Not redacted or sealed.
ECF No. 2360-3	Ex. 1, Amended Rebuttal Report of Dr. Sharon Hoover for Breathitt	Temporarily filing under seal because document contains information that Defendants may consider to be confidential.
ECF No. 2360-4	Ex. 2, Expert Report of Dr. Sharon Hoover	Not redacted or sealed.
ECF No. 2360-5	Ex. 3, 30(b)(6) Deposition of Phillip Watts	Not redacted or sealed.
ECF No. 2360-6	Ex. 4, 30(b)(1) Deposition of Jeremy Hall (7/28/25)	Not redacted or sealed.
ECF No. 2360-7	Ex. 5, Affidavit of Kera Howard	Not redacted or sealed.
ECF No. 2360-8	Ex. 6, 30(b)(1) Deposition of Jeremy Hall (4/23/25)	Not redacted or sealed.
ECF No. 2360-9	Ex. 7, 30(b)(6) Deposition of Daphne Noble	Not redacted or sealed.
ECF No. 2360-10	Ex. 8, 2021 KIP Survey District Report	Not redacted or sealed.
ECF No. 2360-11	Ex. 9, 30(b)(1) Deposition of Kera Howard	Not redacted or sealed.
ECF No. 2360-12	Ex. 10, Amended Expert Report of Dr. Sharon Hoover for Breathitt	Not redacted or sealed.
ECF No. 2360-13	Ex. 11, 30(b)(1) Deposition of Daphne Noble (7/29/25)	Not redacted or sealed.

1	ECF No. 2360-14	Ex. 12, BHS Youth Service Center 2022 Needs Survey Results	Not redacted or sealed.
2	ECF No. 2360-15	Ex. 13, 30(b)(6) Deposition of Hannah Watts	Not redacted or sealed.
3	ECF No. 2360-16	Ex. 14, 30(b)(6) Deposition of Kera Howard	Not redacted or sealed.
4	ECF No. 2360-17	Ex. 15, Breathitt County Board of Education Policies	Not redacted or sealed.
5	ECF No. 2360-18	Ex. 16, Affidavit of Daphne Noble	Not redacted or sealed.
6	ECF No. 2360-19	Ex. 17, Affidavit of Jeremy Hall	Not redacted or sealed.
7	ECF No. 2360-20	Ex. 18, 30(b)(1) Deposition of Phillip Watts	Not redacted or sealed.
8	ECF No. 2360-21	Ex. 19, Affidavit of Will Noble	Not redacted or sealed.
9	ECF No. 2360-22	Ex. 20, 30(b)(6) Deposition of Stacy McKnight	Not redacted or sealed.
10	ECF No. 2360-23	Ex. 21, Affidavit of Phil Watts	Not redacted or sealed.
11	ECF No. 2360-24	Ex. 22, 30(b)(1) Deposition of Daphne Noble (3/11/25)	Not redacted or sealed.
12	ECF No. 2360-25	Ex. 23, Expert Report of Jeffrey Meyers for Breathitt	Not redacted or sealed.
13	ECF No. 2360-26	Ex. 24, 30(b)(1) Deposition of William Noble	Not redacted or sealed.

Dated: November 7, 2025

Respectfully submitted,

/s/Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr.

Sarah N. Emery

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FILER'S ATTESTATION

I, Ronald E. Johnson, Jr., hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: November 7, 2025

By: /s/Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr.

Sarah N. Emery

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on November 7, 2025, to Counsel for Defendants:

MetaNoticeofService@cov.com

SnapNoticeofService@mto.com

TikTokNoticeofService@faegredrinker.com

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/s/Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr.